COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

	)	
Boston Edison Company, Cambridge	)	**D.T.E. 03-121**
Electric Light Company, and	)	
Commonwealth Electric Company	)	
d/b/a NSTAR Electric	)	
	)	

DIVISION OF ENERGY RESOURCES' FIRST SET OF INFORMATION AND DOCUMENT REQUESTS TO BOSTON EDISON COMPANY, CAMBRIDGE ELECTRIC LIGHT COMPANY, AND COMMONWEALTH ELECTRIC COMPANY, d/b/a NSTAR ELECTRIC

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Division of Energy Resources ("DOER") to Boston Edison Company, Cambridge Electric Light Company, and Commonwealth Electric Company d/b/a NSTAR Electric ("the Company"), in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data complications from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
6. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department of Telecommunications and Energy ("DTE"), and a copy on William Stevens, Hearing Officer for the DTE, as well as serving the appropriate number of copies to all parties and participants on the service list in this proceeding.
7. Please provide responses to all questions within 10 days (filed no later March 9, 2004). If this is not possible for any of the questions, please indicate which questions will take longer than 10 days within the earlier responses.

Information and Document Requests

DOER 1-1

Please provide a copy of each and every report submitted to the Department beginning with the year 1997, for the Department's Annual Report Concerning Self-Generation. Please provide all related information used to produce those reports, including Company e-mails, memos, minutes, agendas, calculations, or other notes created in preparation for or during Company meetings.

DOER 1-2

Please provide any data used to ascertain the impact of existing installed distributed generation ("DG") when determining the appropriateness of the proposed standby rates. Please include in your response any data that demonstrates the amount of on-site

generation installed in the Company’s area by service territory, any estimates of reduced sales, and any estimates of increased costs.

DOER 1-3

Please provide any data used to ascertain the impact of future installed DG when determining the appropriateness of the proposed standby rates. Please include in your response any data that demonstrates the Company’s forecast of new on-site generation expected to be installed in the Company’s area by service territory, any estimates of reduced sales, and any estimates of increased costs.

DOER 1-4

Referring to Exhibit NSTAR-HCL-1, page 15 at lines 11-12, please provide the Company's definition, quantitatively and qualitatively, of a 'properly-sized distribution and transmission system' and state the Company's position as to how and when aggregated Distributed Generation on the Company's system could defer material costs of a properly-sized distribution and transmission system. If costs could not be materially deferred by DG, please state that as well.

DOER 1-5

Referring to the above cited exhibit, on page 19 at lines 10-11, please provide data and workpapers supporting the statement that the proportion of transmission costs that are unavoidable to the provision of standby delivery service is "relatively lower than for distribution plant because of the higher level of diversity between individual customer loads.”

DOER 1-6

Referring again to page 19 at 11-14, please provide calculations and related workpapers or accurate estimates and workpapers of the levels of diversity between individual customer loads at the aggregate system level and the Company's distribution plant level.

DOER 1-7

Please provide data and workpapers used to support the assertion made on page 19 at line 14 that "there is no diversity factor for standby service that would be appropriate for a few DG customers."

DOER 1-8

Please provide information, including generator location, size, annual outputs throughout the lifetime of the generator, on all on-site generation installed currently in the Company's service territories with a combined nameplate rating greater than 60 kW.

DOER 1-9

Please provide an organized tabulation of proposed StandBy Service charges for all NSTAR companies (Boston Edison, Cambridge Electric, & Commonwealth).

DOER 1-10

Please provide the Company's position as to their willingness to provide standby service at a lower price for on-site generators that perform at a threshold capacity factor of, for example, greater than 80% or prices as a function of the DG's historic performance levels.

DOER 1-11

Please explain the reasoning behind the determination of 60kW as the generation nameplate rating threshold for application of the proposed rates. Also, please provide all relevant workpapers.

DOER 1-12

For Cambridge Electric, does the 60 kW threshold represent a change from the threshold rating in current Cambridge Electric Rates? If so, please provide any workpapers and an explanation for this change, denoting the specific rates that are closed by this filing.

DOER 1-13

Setting aside the provision that current standby-service customers will stay on their current rates, please compare current standby rates customers' bills under current rates to the same customers' bills under the proposed rates.

DOER 1-14

Please provide a forecast of growth in standby service in NSTAR's territory. If no forecast exists, please explain the statement in Exhibit NSTAR-HCL-1, on page 8 at lines 11-12 that, "DG...is expected to increase its impact, where economically and technologically feasible."

DOER 1-15

As per testimony in Exhibit NSTAR-HCL-1, page 15 at lines 16 – 20, please provide a listing of those areas in NSTAR's territory that are "dedicated to serve the peak needs of certain customers," versus those areas where "transmission facilities are shared among many customers."

DOER 1-16

Is it likely or unlikely that the application of the proposed rates will increasingly shift costs from non-standby-service customers to standby-service customers?

DOER 1-17

Do the current NSTAR non-standby-rates accurately distinguish between costs that vary by usage and those that are usage-sensitive? That is, do the fixed rate components of such rates reflect fixed costs of providing service and do the variable components reflect variable costs?

DOER 1-18

What is the reasoning behind the closing of the existing Cambridge Electric standby-service rates? In what way(s) are they deficient?

DOER 1-19

Why are existing standby-service customers grandfathered, yet existing non-standby-service customers are subject to changes? That is, don't non-standby-service customers make investment decisions based on the Company's then-existing tariffs?

DOER 1-20

Do current non-standby rates feature an “appropriate” (as used in Exhibit NSTAR-HCL-1, page 11, lines 14 –15) level of cross-subsidization of costs among customers? If so, please specify which rate classes pay more than the costs they cause, and which pay less, and by how much each rate class subsidizes or is subsidized by other rate classes.

DOER 1-21

Does the avoidance of transmission, transition, DSM, and renewables charge represent an accurate accounting of the actual avoided costs due to distributed generation facilities? If so, does this mean that if customers pay this rate, then there will be neither an overcollection nor an undercollection of costs to serve standby-service customers as a group or individually?

DOER 1-22

Are avoided costs, as accounted for in the proposed rates, the only benefits to investment in DG facilities in NSTAR’s service territory? That is, do the proposed rates imply that there are no distribution-related costs avoidable due to use of DG?

DOER 1-23

Please provide the rate sheets for all customers requiring non-firm standby service.